

**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
HEALTHCARE SYSTEMS BRANCH**

In re: Suzanne Naples, L.P.N.

Petition No. 2005-1020-011-041

STATEMENT OF CHARGES


Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Suzanne Naples, L.P.N.:

1. Suzanne Naples of Southington (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nurse license number 017423.
2. At all relevant times, respondent was employed as a licensed practical nurse at the office of Richard Giosa, M.D., in Meriden, Connecticut.
3. From approximately December 2003 until October 2004, while working as a licensed practical nurse at the office of Richard Giosa, M.D., respondent:
 - a. obtained approximately fifty prescriptions for Hydrocodone Syrup from several different pharmacies using Dr. Giosa's name or his partner's name;
 - b. purchased 47 pints of Hydrocodone Syrup from Moore Medical Distributor, New Britain; and/or
 - c. supplied another office employee with Hydrocodone syrup.
4. From approximately December 2003 until October 2004, respondent abused or utilized to excess Hydrocodone syrup.
5. Respondent's abuse of Hydrocodone syrup does, and/or may, affect her practice as a licensed practical nurse.
6. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99(b) including but not limited to:
 - a. §20-99(b)(2);
 - b. §20-99(b)(5); and/or
 - c. §20-99(b)(6).

THEREFORE, the Department prays that:

The Connecticut Board of Examiners for Nursing, as authorized by the General Statutes of Connecticut, §§20-99(b) and 19a-17, revoke or order other disciplinary action against the license of Suzanne Naples as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 12th day of January 2005.



Jennifer Filippone, Section Chief
Practitioner Licensing and Investigations
Healthcare Systems Branch

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